

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**ALYSSON MILLS, IN HER CAPACITY  
AS RECEIVER FOR ARTHUR LAMAR  
ADAMS AND MADISON TIMBER  
PROPERTIES, LLC**

**PLAINTIFF**

**vs.**

**CASE NO. 3:18-cv-866-CWR-FKB**

**BUTLER SNOW LLP; BUTLER SNOW  
ADVISORY SERVICES, LLC; MATT  
THORNTON; BAKER, DONELSON,  
BEARMAN, CALDWELL & BERKOWITZ  
PC; ALEXANDER SEAWRIGHT, LLC;  
BRENT ALEXANDER; and JON  
SEAWRIGHT**

**DEFENDANTS**

---

**MOTION TO DISMISS CLAIMS AGAINST ALEXANDER SEAWRIGHT, LLC  
AND BRENT ALEXANDER**

---

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), and for the reasons set forth in their accompanying Memorandum in Support of this Motion to Dismiss, Defendants Alexander Seawright, LLC and Brent Alexander move the Court to dismiss with prejudice all claims against them in Counts I, II, III, V, and VI of the Receiver's Amended Complaint, as well as the Receiver's demand for declaratory judgment of personal liability against Brent Alexander. The Receiver's Amended Complaint acknowledges that Jon Seawright filed individual bankruptcy on November 3, 2019, automatically staying the Receiver's claims against him. *See* Amended Complaint at ¶ 120–122. Accordingly, this Motion does not seek adjudication of any claims against Mr. Seawright individually.

Date: December 20, 2019.

Respectfully submitted,

**ALEXANDER SEAWRIGHT, LLC and BRENT  
ALEXANDER**

By: /s/ R. David Kaufman  
R. David Kaufman  
One of Their Attorneys

R. David Kaufman (MSB #3526)  
Cody C. Bailey (MSB #103718)  
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC  
The Pinnacle Building, Suite 100  
190 East Capitol Street (39201)  
Post Office Drawer 119  
Jackson, Mississippi 39205  
Telephone: (601) 948-3101  
Facsimile: (601) 960-6902  
Email: dkaufman@brunini.com

*Counsel for Defendants Alexander Seawright, LLC,  
Brent Alexander, and Jon Seawright*

**CERTIFICATE OF SERVICE**

I, R. David Kaufman, hereby certify that on December 20, 2019, I caused the foregoing pleading to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and registered participants.

/s/ R. David Kaufman  
R. David Kaufman